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8 Financial  
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10 UNITED STATES BANKRUPTCY COURT  
11 DISTRICT OF NEW JERSEY  
12

13 In re: )  
14 ) Case No. 17-19000(JNP)  
15 )  
16 SAKIA T. HILL ) Chapter 13  
17 )  
18 ) Hearing Date: 7-5-17  
19 )  
20 ) **OBJECTION TO CONFIRMATION**  
21 )

22 AmeriCredit Financial Services, Inc., dba GM Financial ("GM  
23 FINANCIAL"), a secured creditor of the debtor, objects to  
24 the confirmation of the debtor's plan for the following  
25 reasons:

26 a. **VEHICLE UNDERVALUED:** GM FINANCIAL has a first purchase  
27 money security interest encumbering a 2013 Jeep Patriot  
28 Latitude 4wd vehicle. In May of 2017, with assumed  
29 mileage of 62,500 the vehicle had a clean retail value of  
\$13,425 in the NADA Official Used Car Guide. The plan  
must be amended to pay GM Financial \$13,425 with interest  
at 5%. The trustee should compute interest. If interest  
was precomputed and the debtor made all payments timely,

1 the trustee would pay GM FINANCIAL \$14,484.93 over 36  
2 months or \$15,200.78 over 60 months.

3 b. The plan as proposed also violates §1326(a)(1) and 1325  
4 (a)(5)(B)(iii)(I) since it does not provide for payment  
5 to GM FINANCIAL of sufficient adequate protection  
6 payments or equal monthly payments. Adequate protection  
7 payments should be made to GM FINANCIAL beginning in June  
8 of 2017 at \$201 per month, being 1.5% of the vehicle  
9 value. Adequate protection payments should be given  
10 super priority administrative expense status and paid  
11 ahead of attorney fees. Adequate protection payments  
12 should continue after confirmation and be paid until  
13 regular distributions begin to be made to GM Financial.  
14

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16 c. **Proof of insurance:** The vehicle must be insured with  
17 comprehensive and collision insurance coverage and  
18 liability coverage in accordance with the requirements  
19 contained in the contract. GM FINANCIAL Dealer Services  
20 must be listed as loss payee or additional insured. **The**  
21 **debtor must provide GM FINANCIAL with proof that the**  
22 **vehicle is insured in accordance with §1326(a)(4) and**  
23 **this portion of the objection to confirmation should be**  
24 **considered a demand that the debtor provide proof of**  
25 **insurance.**  
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d. GM FINANCIAL must retain its lien on the vehicle after confirmation and the plan must provide for this.

e. The order of payments in the plan must be revised to pay adequate protection payments before all other payments with the exception of trustee commissions.

/s/ John R. Morton, Jr.\_\_\_\_  
John R. Morton, Jr., attorney for  
GM FINANCIAL

Dated: 6-16-17